



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 1, 2021

BY ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Martin Ross*, S1 19 Cr. 913 (SHS)

Dear Judge Stein:

The Government writes on behalf of both parties to jointly request modification of pretrial filing deadlines in advance of the November 2, 2021 trial in this case (recently adjourned from October 27). In light of ongoing final discussions regarding the possibility of a pretrial disposition, the parties respectfully request a brief adjournment of the pretrial filing schedule, as follows:

- Motions in limine, requests to charge, and proposed voir questions will now be due by September 22;
- Oppositions to motions in limine will now be due by October 6; and
- The final pretrial conference will be adjourned from October 14 to the following week at a time that is convenient for the Court. *October 19 at 10:30 A.M.*

The requested modification will allow both parties to most effectively allocate resources and ensure the most effective representation of counsel. We thank the Court for its consideration of this request.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by:

[Signature]
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Southern
Sidney H. Stein
U.S.D.

cc: Defense counsel (by ECF)